Asarco File

1099995 - R8 SDMS

Scott
Brown/MO/R8/USEPA/US
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To Linda Jacobson/R8/USEPA/US@EPA, Charles Figur/R8/USEPA/US@EPA, Steven Moores/ENF/R8/USEPA/US@EPA, ltodd@pwt.com, Wendy
cc Andrea Madigan/ENF/R8/USEPA/US@EPA

bcc

Subject Google Earth Image

History: This message has been replied to.

Linda, Chuck and Steven: Yesterday, I met with officials from Lewis and Clark County, MDEQ and Asarco to initiate development of a sampling and analysis plan for residential areas in and around East Helena that were not sampled in previous sampling efforts. We identified approximately 230 developed properties that will be sampled in 2009. Doing so will allow us to be as certain as we can reasonably be that we have not overlooked properties that might qualify for cleanup under existing protocols. These properties generally lie outside of the "red isoline" (see the red isocontour of the proposed plan's Figure 1). The red isoline is based on over 1,500 separate properties sampled over the past 20 years. The red isoline represents the upper 97.5% confidence limit (UCL 97.5%) derived from those 1,500+ sampled properties and it means that, statistically, there is less than a 3% chance that we will find properties with a single soil lead value greater than 1,000 ppm outside of that isoline. However, because our experience has shown us over the years that lead contamination has not always followed our models or reasoning, this sampling effort for 2009 is a safety net. This effort will analyze for lead, arsenic and cadmium.

We also initiated development of a sampling and analysis plan for the railroad right-of-way near Manlove Addition. See the Google Earth image enclosed and a second one (a close-up) being sent separately. The triangle of rail lines and a paved road that surrounds Manlove Addition will be the subject of our sampling plan. We propose to sample:

(a) the area between the main rail line and Manlove yards;

(b) the area east of Manlove but west of the paved road, with numerous spur lines that end immediately west of the paved road;

(c) both sides of (north and south of) the longer spur that extends from the main line, across the rodeo grounds and onto the former smelter property (CERCLA will sample only up to the paved road); and

(d) both sides of (north and south of) the secondary rail line that passes to the south of Manlove Addition and proceeds to Montana City (CERCLA will sample only up to the paved road that forms the western boundary of the smelter).

Our interests are to satisfy the terms of the proposed plan and take action without further delay to clean up these suspected sources of high levels of lead adjacent to Manlove Addition. Assuming the proposed $3.145 million allocation for 2009 from the global environmental trust fund is given final approval soon, we want to characterize the railroad right-of-way and clean it up as soon as possible. We propose to analyze for the entire suite of metals and arsenic, including selenium, thallium, silver, zinc, cadmium, lead, iron, copper, and some 10 to 12 others, as the RCRA program chooses.

We invite your input to the plan for the rail lines, both now and as soon as a draft plan is written. I welcome a call at 406-457-5035.

Note: a second image is forthcoming.

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Google
46°35'06.26" N 111°55'42.56" W elev 1197 m Apr 2004 Eye alt 1.67 km


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46°35'14.53" N 111°55'34.58" W elev 1189 m Apr 2004 Eye alt 1.29 km